

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HINDS COUNTY, MISSISSIPPI, et al.,

Plaintiffs,

-against-

WACHOVIA BANK N.A., et al.,

Defendants.

08 Civ. 2516 (LTS)

**NOTICE OF MOTION FOR
ADMISSION PRO HAC VICE**

PLEASE TAKE NOTICE that upon the annexed affidavit of Craig A. Stewart, Defendants GE Funding Capital Market Services, Inc. and Trinity Funding Co., LLC will move this Court, before the Honorable Laura Taylor Swain for an Order admitting Douglas L. Wald, David S. Eggert and Jon J. Nathan to the Bar of this Court *pro hac vice* pursuant to Local Rule 1.3(c).

Dated: New York, New York
April 23, 2008

ARNOLD & PORTER LLP

By: 

Craig A. Stewart
399 Park Avenue
New York, New York 10022
(212) 715-1000 (Tel)
(212) 715-1399 (Fax)
Craig_Stewart@aporter.com

*Attorney for Defendants GE Funding Capital
Market Services, Inc. and Trinity Funding Co., LLC*

649079875
APR 25 2008

FILED
APR 25 2008
CLERK OF COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HINDS COUNTY, MISSISSIPPI, et al.,

Plaintiffs,

-against-

WACHOVIA BANK N.A., et al.,

Defendants.

08 Civ. 2516 (LTS)

AFFIDAVIT

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Craig A. Stewart, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court. I make this affidavit in support of the motion of Defendants GE Funding Capital Market Services, Inc. and Trinity Funding Co., LLC (“GE”) for the admission of Douglas L. Wald, Esq., David S. Eggert, Esq. and Jon J. Nathan, Esq. to the Bar of this Court *pro hac vice*.

2. Mr. Wald is a member of the firm of Arnold & Porter LLP, counsel for GE in the above-captioned action. Mr. Wald is a member in good standing of the Bar of the District of Columbia (a certified copy of a certificate of good standing is annexed hereto as Exhibit A).

3. Mr. Wald has advised me that he is familiar with the Federal Rules of Civil Procedure and with the local rules of this Court.

4. I can personally attest that Mr. Wald is of the highest competence and character.

5. Mr. Eggert is a member of the firm of Arnold & Porter LLP, counsel for GE in the above-captioned action. Mr. Eggert is a member in good standing of the Bar of the District of Columbia (a certified copy of a certificate of good standing is annexed hereto as Exhibit B).

6. Mr. Eggert has advised me that he is familiar with the Federal Rules of Civil Procedure and with the local rules of this Court.

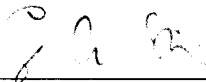
7. I can personally attest that Mr. Eggert is of the highest competence and character.

8. Mr. Nathan is associated with the firm of Arnold & Porter LLP, counsel for GE in the above-captioned action. Mr. Nathan is a member in good standing of the Bar of the District of Columbia (a certified copy of a certificate of good standing is annexed hereto as Exhibit C).

9. Mr. Nathan has advised me that he is familiar with the Federal Rules of Civil Procedure and with the local rules of this Court.

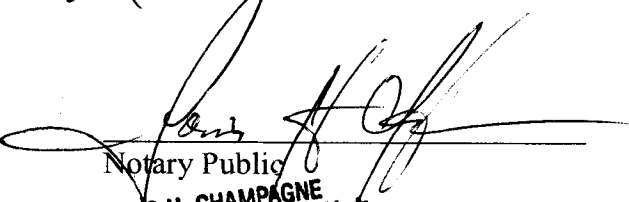
10. I can personally attest that Mr. Nathan is of the highest competence and character.

11. Accordingly, I respectfully request that Douglas Wald, Esq., David S. Eggert, Esq. and Jon J. Nathan, Esq. be admitted to the Bar of this Court *pro hac vice*.



Craig A. Stewart

Sworn to before me this
2nd day of April 2008.



Notary Public
LOUIS H. CHAMPAGNE
Notary Public, State of New York
No. 01CH6066853 Qualified in Queens County
Certificate Filed in New York County
Commission Expires November 26, 2009



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

DOUGLAS L. WALD

was on the 24TH day of DECEMBER, 1979

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on April 15, 2008.

GARLAND PINKSTON, JR., CLERK

By: C. J. Charles
Deputy Clerk



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

DAVID S. EGGERT

was on the 7TH day of DECEMBER, 1984

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on April 15, 2008.

GARLAND PINKSTON, JR., CLERK

By: *[Signature]*
Deputy Clerk



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JON J. NATHAN

was on the 9TH day of JANUARY, 2004

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.


In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on April 15, 2008.

GARLAND PINKSTON, JR., CLERK

By: [Signature]
Deputy Clerk

CERTIFICATE OF SERVICE

I, Anthony D. Boccanfuso, hereby certify that on this 23rd day of April, 2008, I served a true and correct copy the annexed **NOTICE OF MOTION FOR ADMISSION PRO HAC VICE** by first class mail, postage pre-paid, on the attached service list.



Anthony D. Boccanfuso

Hinds County, Mississippi v. Wachovia Bank N.A. et al.
Service List

Plaintiff:

Roland Gustaf Riopelle
SERCARZ & RIOPELLE, LLP
152 West 57th Street
24th Floor
New York, NY 10019

HINDS COUNTY, MISSISSIPPI

Precious Tyrone Martin
SERCARZ & RIOPELLE, LLP
152 West 57th Street
24th Floor
New York, NY 10019

Defendants:

David Burce Tulchin
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, NY 10004

WACHOVIA BANK, N.A.

AIG FINANCIAL PRODUCTS CORP.
50 Danbury Road
Wilton, CT 06897

AIG FINANCIAL PRODUCTS CORP.
No counsel of record

AIG SUNAMERICA LIFE ASSURANCE
CO.

AIG SUNAMERICA LIFE ASSURANCE CO.
No counsel of record

Hinds County, Mississippi v. Wachovia Bank N.A. et al.

Service List

1 SunAmerica Center
Los Angeles, CA 90067-6022

BEAR, STEARNS & CO., INC.
383 Madison Avenue
New York, NY 10019

BEAR, STEARNS & CO., INC.
No counsel of record

FINANCIAL SECURITY ASSURANCE
HOLDINGS, LTD
31 West 52nd Street
New York, NY 10019

FINANCIAL SECURITY ASSURANCE
HOLDINGS, LTD
No counsel of record

FINANCIAL SECURITY ASSURANCE,
INC.
31 West 52nd Street
New York, NY 10019

FINANCIAL SECURITY ASSURANCE, INC.
No counsel of record

FINANCIAL GUARANTY INSURANCE
COMPANY
125 Park Avenue
New York, NY 10017

FINANCIAL GUARANTY INSURANCE
COMPANY
No counsel of record

GENWORTH FINANCIAL INC.
6620 W. Broad Street
Richmond, VA 23230

GENWORTH FINANCIAL INC.
No counsel of record

NATIXIS S.A.
45 Rue Saint-Dominique
75007 Paris, France

NATIXIS S.A.
No counsel of record

Joseph Franklin Wayland
SIMPSON THACHER & BARTLETT,
LLP
425 Lexington Avenue
New York, NY 10017

JP MORGAN CHASE & CO.

Hinds County, Mississippi v. Wachovia Bank N.A. et al.

Service List

Allon Lifshitz
David Mark Cave
Michael E. Gertzman
Moses Silverman
PAUL, WEISS, RIFKIND, WHARTON
& GARRISON
1285 Avenue of the Americas
New York, NY 10019-6064

LEHMAN BROTHERS INC.

MERRILL LYNCH & CO.
4 World Financial Center
250 Vesey Street
New York, NY 10080

MERRILL LYNCH & CO., INC.
No counsel of record

MORGAN STANLEY
1585 Broadway
New York, NY 10036

MORGAN STANLEY
No counsel of record

NATIONAL WESTMINSTER
BANK PLC
135 Bishopsgate
London
EC2M 3 UR, England

NATIONAL WESTMINSTER BANK PLC
No counsel of record

PIPER JAFFRAY & CO.
800 Nicollet Mall
Suite 800
Minneapolis, MN 55402-7020

PIPER JAFFRAY & CO.
No counsel of record

Erica Eileen Flores
Matthew D. Ingber
Michael O. Ware
Paula Garrett Lin
Richard Marc Steuer
Steven Wolowitz
MAYER BROWN LLP
1675 Broadway
New York, NY 10019

SOCIETE GENERALE SA

UBS AG
Bahnhofstrasse 45
CH-8098
Zurich, Switzerland

UBS AG
No counsel of record

Hinds County, Mississippi v. Wachovia Bank N.A. et al.

Service List

XL ASSET FUNDING LLC
20 N. Martingale Road, Suite 200
Schaumburg, IL 60173-2415

XL ASSET FUNDING LLC
No counsel of record

XL LIFE INSURANCE & ANNUITY
COMPANY

XL LIFE INSURANCE & ANNUITY COMPANY
No counsel of record

NATIXIS FUNDING CORP.
9 West 57th Street
36th Floor
New York, NY 10019

NATIXIS FUNDING CORP.
No counsel of record

INVESTMENT MANAGEMENT
ADVISORY GROUP, INC.
886 Vaughn Road
Pottstown, PA 19464

INVESTMENT MANAGEMENT
ADVISORY GROUP, INC.
No counsel of record

Richard T. Marooney, Jr.
KING & SPALDING, LLP
1185 Avenue of the Americas
New York, NY 10036

BANK OF AMERICAN N.A.

CDR FINANCIAL PRODUCTS
9777 Wilshire Boulevard, Suite 800
Beverly Hills, CA 90212

CDR FINANCIAL PRODUCTS
No counsel of record

FELD WINTERS FINANCIAL, LLC
15260 Ventura Boulevard
Suite 2220
Sherman Oaks, CA 91403

FELD WINTERS FINANCIAL LLC
No counsel of record

WINTERS & CO. ADVISORS, LLC
11845 W. Olympic Boulevard
Suite 540
Los Angeles, CA 90064

WINTERS & CO. ADVISORS, LLC
No counsel of record

Alden Lewis Atkins
VINSON & ELKINS LLP
1455 Pennsylvania Avenue NW
Suite 600
Washington, DC 20004

FIRST SOUTHWEST COMPANY

GEORGE K. BAUM & CO.
4801 Main Street
Suite 500
Kansas City, MO 64112

GEORGE K. BAUM & CO.
No counsel of record

Hinds County, Mississippi v. Wachovia Bank N.A. et al.

Service List

KINSELL NEWCOMB &
DE DIOS, INC.
2776 Gateway Road
Carlsbad, CA 92009

KINSELL NEWCOMB & DE DIOS, INC.
No counsel of record

PACKERKISS SECURITIES, INC.
Fifteen North East Fourth Street
Suite A
Delray Beach, FL 33444

PACKERKISS SECURITIES, INC.
No counsel of record

SHOCKLEY FINANCIAL CORP.
2229 S. Joliet Way
Aurora, CO 80014

SHOCKLEY FINANCIAL CORP.
No counsel of record

SOUND CAPITAL MANAGEMENT,
INC.
6400 Flying Cloud Drive
Suite 210
Eden Prairie, MN 55344

SOUND CAPITAL MANAGEMENT, INC.
No counsel of record

Howard Jay Kaplan
Lisa Christine Solbakken
Stephen Thomas Heiser
ARKIN KAPLAN RICE LLP
590 Madison Avenue, 35th Floor
New York, NY 10022

CAIN BROTHERS & CO., LLC

MORGAN KEEGAN & CO., INC.
50 N. Front Street
Memphis, TN 38103

MORGAN KEEGAN & CO., INC.
No counsel of record

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HINDS COUNTY, MISSISSIPPI, et al.,

Plaintiffs,

-against-

WACHOVIA BANK N.A., et al.,

Defendants.

08 Civ. 2516 (LTS)

ORDER

Pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York and upon the affidavit of Craig A. Stewart, Esq., a member of the Bar of this Court, it is

ORDERED that Douglas L. Wald, Esq., David S. Eggert, Esq. and Jon J. Nathan, Esq. be admitted to the Bar of this Court *pro hac vice* as counsel for Defendants GE Funding Capital Market Services, Inc. and Trinity Funding Co., LLC.

Dated: New York, New York
April __, 2008

SO ORDERED:

U.S.D.J.